

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

<b>KEVIN COOK and CABELL GOODMAN,</b>	§	<b>CIVIL ACTION NO. 3:24-cv-00656-MHL</b>
<b>PLAINTIFFS,</b>	§	
<b>VERSUS</b>	§	
	§	<b>DISTRICT JUDGE M. HANNAH LAUCK</b>
<b>ADVON CORPORATION,</b>	§	
<b>DEFENDANT.</b>	§	
	§	

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**DEFENDANT’S MOTION FOR PROTECTIVE ORDER  
TO HOLD DEPOSITIONS OF DEFENDANT’S EMPLOYEES IN FLORIDA, OR  
ALTERNATIVELY, BY REMOTE MEANS**

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Defendant, Advon, Corporation (“Defendant” or “Advon”), who respectfully moves the Court to order the depositions of two of Advon’s employees, William “Bill” Graham, President of Advon, and Debbie Caruthers, Controller of Advon, to be held at Advon’s headquarters in Tallahassee, Florida, or, alternatively, by remote means pursuant to Federal Rule of Civil Procedure 30(b)(4).

Plaintiffs cannot overcome the presumption that the depositions of non-resident defendants should occur at their place of residence. And while, generally, under Local Civil Rule 30(A), a party filing a civil action in the United States District Court for the Eastern District of Virginia must ordinarily be required to submit to a deposition within the designated division, for the reasons explained in Advon’s Memorandum in Support of its Motion for Protective Order, exceptional and special circumstances exist to for these depositions to be held in Florida or by remote means.

In support of this Motion for Protective Order, Advon relies on the following exhibits:

Exhibit 1	May 28-June 5, 2025 Email Correspondence between Counsel of Record.
Exhibit 2	Notice of Deposition of Debbie Caruthers.

Exhibit 3	Notice of Deposition of Bill Graham.
Exhibit 4	Declaration of William “Bill” Graham.
Exhibit 5	Declaration of Deborah “Debbie” Caruthers.

**CERTIFICATE PURSUANT TO RULE 26(c)(1)**

I, the undersigned counsel for Defendant, Elizabeth Bailly Bloch, hereby certifies that on June 10, 2025, via telephone, she in conferred in good faith with Plaintiffs’ counsel of record, Blackwell N. Shelley, Jr., in effort to resolve this matter without court action.

/s/Elizabeth Bailly Bloch

**WHEREFORE**, Defendant, Advon Corporation prays that its motion be granted and the depositions William “Bill” Graham and Debbie Caruthers be held in Tallahassee, Florida, or alternatively, by remote means.

Respectfully submitted on this the 24th day of June, 2025

By: /s/ Elizabeth Bailly Bloch  
ELIZABETH BAILLY BLOCH (VSB No. 99695)  
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ATTORNEYS FOR DEFENDANT  
Advon Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of June, 2025, a copy of the foregoing was filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

/s/Elizabeth Bailly Bloch  
ELIZABETH BAILLY BLOCH